

# Campbell Park Neighbourhood Development Plan

## Report of Examination

**Report to Milton Keynes Council**

by the Independent Examiner:

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4 June 2018

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## **Summary**

1. From my examination of the submitted Campbell Park Neighbourhood Development Plan and the supporting documents, including all the representations made, I have concluded that, subject to the modifications I am recommending, the Neighbourhood Development Plan should proceed to referendum.
2. I have concluded that, subject to my recommended modifications, the plan meets the Basic Conditions. In summary, the Basic Conditions are that it must:
  - Be appropriate to make the plan, having regard to national policies and advice;
  - Contribute to the achievement of sustainable development;
  - Be in general conformity with the strategic policies of the development plan; and
  - Not breach, and be otherwise compatible with, European Union and European Convention on Human Rights obligations.
3. I have concluded that, subject to certain modifications, the plan meets the legal requirements in that:
  - It has been prepared and submitted for examination by a qualifying body – Campbell Park Parish Council;
  - It has been prepared for an area properly designated;
  - It does not cover more than one neighbourhood plan area;
  - It does not relate to “excluded development”;
  - It specifies the period to which it has effect – to 2026; and
  - The policies relate to the development and use of land for a designated neighbourhood area.
4. Overall, I have concluded that the Neighbourhood Development Plan should proceed to Referendum and that the Referendum Area should be the same as the designated neighbourhood area.

## **1. Introduction**

- 1.1 I am appointed by Milton Keynes Council, with the support of the Campbell Park Parish Council, the Qualifying Body, to undertake an independent examination of the Campbell Park Neighbourhood Development Plan, as submitted for examination.
- 1.2 I am an independent planning and development professional of 40 years standing and a member of NPIERS' Panel of Independent Examiners. I am independent of any local connections and have no conflicts of interests.

### **The Scope of the Examination**

- 1.3 It is the role of the Independent Examiner to consider whether making the plan meets the "Basic Conditions." These are that in making the Neighbourhood Plan it must:
  - be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan for the area; and
  - not breach, and must otherwise be compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 1.4 Regulations also require that the Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 1.5 In examining the Plan I am also required to establish if the plan complies with certain legal requirements; in summary they are whether it:
  - Has been prepared and submitted for examination by a qualifying body;
  - Has been prepared for an area that has been properly designated;
  - Meets the requirements that they must not include excluded development;
  - Relates to more than one Neighbourhood Area; and
  - Relates to the development and use of land.
- 1.6 Finally, as independent Examiner, I must make one of the following recommendations in relation to the Plan proceeding to a Referendum:
  - a) that it should proceed to Referendum, on the basis that it meets all legal requirements; or
  - b) that once modified to meet all relevant legal requirements it should proceed to Referendum; or
  - c) that it should not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
- 1.7 Second, I am also required to consider whether or not the Referendum Area should extend beyond the Neighbourhood Designated Area to which the Plan relates.

## **The Examination process**

- 1.8 I was appointed to examine the plan on 12<sup>th</sup> April 2018. The default position is that neighbourhood plan examinations are conducted by written representations and that is what I have done. I carried out an unaccompanied site visit in May 2018.
- 1.9 I submitted a draft of my report to MK and Parish Councils towards the end of May for fact-checking. At that point an error was pointed out to me: On page 21 of the Plan, Site 10 is listed as 'Allocated land to the rear of the Public House at Springfield'. However, Housing Policy 2 – opportunities for housing development - explains that the land is an opportunity for a 'small community facility – use class D. The Parish Council in fact intended that the land be used for housing as Springfield already has a suitable Community Centre with access available for all. I **recommend** that this error be corrected.

## **The Examination documents**

- 1.10 In addition to the legal and national policy framework and guidance (principally The Town and Country Planning Acts, Localism Act, Planning and Compulsory Purchase Act, Neighbourhood Planning Regulations, the National Planning Policy Framework, Written Ministerial Statements and the Planning Practice Guidance) together with the development plan, the relevant documents that were furnished to me - and were identified on the Council's websites as the neighbourhood plan and its supporting documentation for examination - were:
- Campbell Park Neighbourhood Development Plan;
  - Basic Conditions Statement;
  - Consultation Statement;
  - SEA Screening Statement and Appropriate Assessment Screening; together with
  - Responses received under Regulation 16 (referred to later).

## **The Qualifying Body and the Designated Area**

- 1.11 Campbell Park Parish Council is the Qualifying Body for the designated area that is the neighbourhood plan area. Milton Keynes Council, the local authority, designated the Neighbourhood Area in May 2013. There is no other neighbourhood plan for this area.

## **The Neighbourhood Plan Area**

- 1.12 The plan area is located south of central Milton Keynes and extends to the east beyond Campbell Park, which was once part of the historic parish.
- 1.13 The neighbourhood area is the same as the current parish (the boundaries having been revised in 2012), comprising seven grid squares of what is now the new town of Milton Keynes. There are five grid square that are residential communities – Oldbrook, Fishermead, and Springfield are post war new town schemes dating mainly from the 1970's; while the heart of both Willen and Woolstone have origins that pre-date the establishment of the new town (indeed with a heritage dating back 1000 years). The two other grid squares are Winterhill (predominantly commercial)

and Newlands (predominantly a leisure area). The neighbourhood also includes Willen Lake, a major city-wide leisure area.

- 1.14 There are some 16,500 people living in the parish, from across a broad spectrum of cultural, ethnic, social and economic backgrounds. Tenures vary considerably, with 93% owner-occupied in Woolstone to 42% rented in Fishermead; the highest rate of shared ownership is in Willen (13%); Fishermead, the closest to central Milton Keynes, has a higher transient population with a greater proportion of Houses in Multiple Occupation (HMOs).
- 1.15 The plan area contains a range of social and leisure facilities. Often these are clustered in local centres; for example in Fishermead, The Trinity Centre and, Medical Centre and post office form a group. Springfield is served by a local centre; Oldbrook benefits from the Christian Centre which also acts as local conference centre and meeting place. Willen has a historic church and a well-supported Hospice; Woolstone Community Centre operates a local hub and meeting place. There are two medical practices, one an extension from Newport Pagnell; and seven schools.
- 1.16 The plan area contains some notable public art – the Peace Pagoda and Circle of Hearts – as well as a rich new town legacy landscape comprising formal and informal green spaces and a pedestrian and cycle network (the Redway).

## **2. Neighbourhood Plan preparation and public consultation**

### **The Neighbourhood Development Plan**

- 2.1 After the three introductory chapters, the Neighbourhood Development Plan (NDP) sets out the plan's Vision (section 4) to "...be a modern community, respecting its diverse character and promoting community cohesion". It explains that it is "...Proud of its open spaces and heritage, it will be a place of safety and wellbeing for all residents, providing a central role in the future of the new city, with excellent connections to other areas in Milton Keynes." This vision is developed around six policy aims and two objectives.
- 2.2 Section 5 explains how the plan was prepared and summarises the steps that were taken to survey the plan area, obtain views of residents and to engage with them on the issues. This included a Benchmark Survey (drawing on 2011 Census data), a Residents Survey in 2013, a Housing Needs Survey in 2015 and a review of opportunities and constraints. The Consultation Statement explains these in detail and some of the conclusions are summarised in appendices to the plan. In particular Appendix 9 to the Consultation Statement sets out in detail the Parish Council's responses to comments made in relation to the Draft Plan. I am satisfied that the plan has been subject to adequate public consultation.
- 2.3 Section 6 of the plan sets out the planning policy context, which I cover in my next section. Section 7 is the meat of the plan, with its policies, concluding with Section 8, Making it Happen – dealing with implementation and review. There are three appendices and a glossary. In my view the first two appendices may not be necessary in the final plan. Overall, the plan is concise and well presented and with a clear structure and attractively laid out, graphically. The mapping is poor, however, and in a number of places I am recommending greater clarity.

## **Strategic Environmental Assessment and Appropriate Assessment Screening**

- 2.4 Under Article 3(3) and 3(4) of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC a SEA is required of plans and programmes which “determine the use of small areas at a local level”. The Borough Council as “responsible authority” determines if the plan is likely to have significant environmental effects. They determined, in a Screening Statement of February 2017, that the plan would not require a Strategic Environmental Assessment or an Appropriate Assessment.

### **Public consultation responses**

- 2.5 A total of 9 parties made representations to the submitted plan; parties raising substantive matters included: Gladman, Historic England, The Canal & River Trust and Milton Keynes Council as well as a local resident who submitted voluminous representations around the theme of protecting local green spaces. Most local resident representations were simply supportive of the plan, generally. Some statutory undertakers had no comments.

### **Human Rights and European Obligations**

- 2.6 I have no reason to believe that making the plan would breach or is incompatible with the European Convention on Human Rights or other EU obligations.

### **Plan period**

- 2.7 The neighbourhood plan clearly states, including at para 2.1 and elsewhere, that it covers the period to 2026, which is co-terminus with the plan period of the Council’s Core Strategy, adopted 2013.

### **Excluded development**

- 2.8 A neighbourhood plan cannot include policies for excluded development, such as minerals and waste. I have concluded that the plan does not do so.

### **Land Use Policies**

- 2.9 There are instances where the plan advocates community action by the Parish Council. In those places where the policies do not relate to the use or development of land I have recommended that the policies and supporting text be removed from the body of the plan; though they can be retained as part of an Appendix, provided it is clear that they sit under a heading like Community Action and are not stated in any way to be plan policies.

## **3. The Neighbourhood Plan in its planning and local context**

### **National policies and advice**

- 3.1 The neighbourhood plan must have regard to national policies and advice, contained in guidance issued by the Secretary of State, and contribute to the achievement of sustainable development (the first two Basic Conditions). Paragraph 16 of the National Planning Policy Framework (the Framework) is concerned with neighbourhood planning:

*“The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:*

- *“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; [and]*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;”*

The Framework explains at para 184 that:

*“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area”. And: “Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans should not promote less development than set out on the Local plan or undermine its strategic policies.”* The Framework’s policy guidance on Local Green Space designations is set out at para 77.

- 3.2 The plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, para 042 of the Guidance explains that:

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”*

- 3.3 There has to be appropriate evidence to support particular policies, notwithstanding it may express a strong and well-intentioned aspiration or concern of the local community. The Guidance (recently revised Para 040 ref 41-040-20160211) states:

*“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.*

*A local planning authority should share relevant evidence, including that gathered to support its own plan making, with a qualifying body .....*

*Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.*

*In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making”.*

- 3.4 The Basic Conditions Statement (BCS) sets out how the policies in the Neighbourhood Development Plan (NDP) relate to the Framework and the

development plan. I have concluded that the plan seeks to promote sustainable development – a Basic Condition.

### **The Development Plan - strategic policies**

- 3.5 The neighbourhood development plan must be in general conformity with the strategic policies of the development plan for the area:
- Milton Keynes Local Plan 2005 Saved Policies; and
  - Milton Keynes Core Strategy 2013.
- 3.6 The development plan does not contain any site-specific policies or allocations that apply to the neighbourhood plan area. Nor is the area, which is substantially completed as a set of new town communities, a main area identified for development.
- 3.7 Overall, I have concluded that the NDP is, in my view, in general conformity with the strategic policies of the development plan

## **4. Housing policies**

- 4.1 There are five housing policies, one concerned with the control of HMOs, a local issue, while the rest support the provision of new housing. The local housing needs survey (carried out in early 2015 and summarised in Appendix to the plan) estimates a need for over 150 houses and bungalows, 50 apartments and 25 senior living units. It is far from clear how robust this assessment of need was; nor is it obvious how it then matched with the sites that could meet that need. I cannot find any formal sites appraisal of options beyond feedback on various sites, mentioned in the Consultation Statement. Indeed the summary responses in Appendix 2 indicate limited support for the sites identified in the plan.
- 4.2 Gladman were concerned to ensure that the plan contributes to the Core Strategy target of 28,000 homes. However, there is no specific localised target.
- 4.3 **Policy 1** seeks to avoid concentrations of HMOs in any one area. The drafting, however, lacks the clarity required to meet the Basic Conditions. I **recommend** that the policy be modified to read:
- a) result in a concentration that would adversely affect the character of the area*
- 4.4 **Policy 2** identifies 11 sites where new residential development will be supported. I do not consider these to be formal site allocations as no adequate process or evidence can be identified to support such status. Nor is there any indication of how the identified need is matched by the capacity of each site. Nevertheless, this policy represents a positive approach to meeting housing need and sustainable development. However, to be clear and unambiguous the policy needs to link to the list of sites on page 21. I therefore **recommend** that the policy be modified to include, after the reference to maps 2 and 3, the list of sites (and to be cross-referenced with a title, say Table 1). I also **recommend** that for clarity of application, that maps 2 and 3 be replaced by more detailed mapping that is on a scalable OS base with clearly defined boundaries.
- 4.5 **Policy 3** supports the re-use of brownfield land. As no definition of this is given in the glossary I **recommend** that the words “an existing “brownfield” site” are replaced

with the expression “previously development land” which has a national definition.

- 4.6 **Policy 4** is concerned with supporting the conversion of upper floors to housing in local centres.
- 4.7 **Policy 5** seeks to secure a viability assessment for all new housing developments. The very brief supporting text (para 7.9.1) simply says that affordable housing which fits in is important. But no robust, proportionate evidence is presented to justify this policy. I therefore **recommend** that it be deleted.

## **5. Employment and retail policies**

- 5.1 Section 7.11 of the plan deals with three different land uses, often within the same paragraph: employment, leisure and local centres. The plan would be far clearer and less confusing, as well as being more useable as a development management tool, if these three uses were separated. I **recommend** that the policies in section 7.11 and their supporting text be separated into three distinct sub-sections (or sections); I deal with them accordingly. So, in this section I examine the employment and local centres policies and move on to leisure in the next section of my report.
- 5.2 The objective of Employment **Policy 1** is to support a range of commercial uses in part of the Winterhill commercial area, which is now substantially given over to large-format retailing. The mapping to support this policy – Map 5 - is inadequate and as the location referred to is not clear and unambiguous. Therefore, I **recommend** that the location is identified on a scalable OS base with clearly defined boundaries and cross-referenced in the policy itself.
- 5.3 Employment **Policy 2** is a leisure policy – dealt with in my next section – and so should be moved to the appropriate section. **Policy 3** supports small business and I **recommend** should be renumbered 2. **Policy 4** seeks to protect the loss of employment. For clarity I **recommend** that the words “that require planning permission” be deleted. It should also be re-numbered/named to follow the sequence.
- 5.4 **Policies 5 and 6** concern local centres – see below - and I recommend they be moved to the appropriate section. Employment **Policy 7** seeks to restrict commercial development outside local centres. It has no supporting text, no evidence base and I therefore **recommend** it be deleted.

### **Local centres**

- 5.5 Employment **Policy 5** supports retail facilities in the local centres. In terms of achieving clarity I **recommend** that a new sub-heading before para 7.15.1 is inserted: “Local Centres”; and the policies be re-named **Local Centre Policy 1, 2** etc. Policy 5 (as is) needs to include Fishermead – identifiable on the ground and in para 7.30 (as well as in the photos on page 28). The mapping – maps 6,7 and 8 - is relatively poor and I again **recommend** that the locations – which should also include Fishermead – be identified on a scalable OS base with clearly defined boundaries and cross-referenced in the policy itself.
- 5.6 Employment **Policy 6** should be re-named Local Centre Policy 2, as above.

## 6. Leisure, well-being and community facilities policies

### Leisure

- 6.1 Section 7.19 has supporting text for leisure but does not contain all the policies – all the relevant policies now need to be imported from section 7.11, as **recommended** earlier, and consolidated with the supporting text from that section, notably 7.11.2 (first two bullets) and 7.12.1-2 as well as the relevant photos. I **recommend** that for clarity the distinction in leisure and community policies be highlighted with suitable sub-headings.
- 6.2 Employment **Policy 2** – which I recommend is re-named Leisure Policy 1 – supports leisure-related development at Willen Lake and Newlands. However, it is not cross-referenced to Map 4 which itself does not make the boundary sufficiently clear. I **recommend** that the locations be identified on a scalable OS base with clearly defined boundaries and cross-referenced in the policy itself.
- 6.3 Community **Policy 1** is in fact three leisure policies. I recommend that each part be separated into a distinct policy and re-named Leisure Policy 2,3 and 4. For clarity, I **recommend** that the route of the Milton Keynes and Bedford Waterway be cross-referenced to an appropriate map. The Canal & River Trust felt the policy should go further and actively pursue the delivery of sections; however, I saw no evidence to justify such an obligation.

### Community facilities

- 6.4 The community policy sub-section contains a mix of land use policy and advocacy for community actions. In my view and that of MK Council, Community Policies 4-7 are not concerned with the use or development of land but are actions advocated by the Parish Council. I **recommend** that they be deleted from the main body of the plan; though they can be removed to a separate appendix if they are clearly identified as Community Actions, or similar, and not described as policies.
- 6.5 Community **Policy 2** should be re-numbered 1, to be consistent with changes already recommended. This is concerned with avoiding the loss of facilities. I find no evidence for the marketing period in part b) and so I **recommend** that the words after "... no longer viable (and that the premises ...)" be deleted. Community Policy 3 then needs to be re-numbered 2.

## 7. Connectivity policies

- 7.1 The policies seek to enhance movement to and through the plan area. The majority of this is expressed not through policies that are concerned with the use or development of land but with Parish Council actions. I therefore **recommend** that Policies 3,4 and 5-8 be deleted from the main body of the plan; though they can be removed to a separate appendix if they are clearly identified as Community Actions, or similar, and not described as policies.
- 7.2 Connectivity **Policy 1** is concerned with appropriate provision alongside development. For clarity I **recommend** some minor drafting changes:
- At the end of b) add: "... where appropriate."

- Delete c) as this duplicates the development plan
- In e) replace “ensure” with “maximise”.

7.3 **Policy 2** can be retained as a policy if re-phased as I recommend a follows:

“The development of relevant sites that enable or facilitate improved facilities for bus users and specifically enhanced stops at the Fishermead and Springfield local centres and which include facilities ..... will be supported.”

7.4 **Policy 5** needs to be renumbered 3. It is concerned with securing adequate parking. The first and third sentences are concerned with the use and development of land in my view. The middle sentence (“The current quality ....”) is not and I **recommend** that it be removed to a separate appendix and are clearly identified as additional Community Actions, or similar, and not described as part of any policies.

## 8. Environment policies

8.1 The policies in this section are primarily aimed at protecting green and open spaces. Again, much of the sub-section is concerned with advocating actions by the Parish Council. Therefore I **recommend** that those policies that do this, and the supporting text, such as 7.3.7.2-10 be removed to a separate appendix, and are clearly identified as Community Actions, or similar, and not described as policies. In particular I recommend that Environment **Policies 4,5 and 6** be so removed.

8.2 Environment **Policy 1** is concerned to avoid the loss green/open spaces. This aspect attracted many of the local representations to the plan. Some argued for greater protection. There are no recommended Local Green Space designations; though the list of spaces in Appendix 3 might be used as a guide to the application of the policy (though the plan does not make clear why this list is included). At least one representation argued for some spaces to be identified on maps. However, the plan did not argue for this.

8.3 The drafting of the policy, however, lacks clarity. I **recommend** the following modifications:

- Delete the word *potential* in the opening sentence
- Delete the word *any* in a)
- Re-phrase c) to read: “It can be demonstrated that the loss will be mitigated by significant social, economic or environmental benefits”

8.4 Environment **Policy 2** is concerned with impacts on private gardens. While this issue is revealed in the public consultation feedback there is very little evidence to support a new policy; certainly not robust and proportionate evidence. I **recommend** this policy be deleted.

8.5 Environment **Policy 3** seeks to protect local trees. No definition of *important* is indicated, so that it lacks clarity. I **recommend** that the word be replaced with *significant*.

## 9 Design Quality Policies

- 9.1 Section 7.44-5 seeks to secure high standards of design and includes a single overarching policy to achieve this. Historic England emphasised para 58 of the Framework.
- 9.4 The drafting of Policy 1 lacks clarity in places and so I **recommend** the following modifications:
- Re-draft the opening sentence to read: All new development shall have regard to the following criteria:
  - In b) replace “it is close” with “Proximity”
  - In c) delete “it has”
  - In j) delete “are defined”

## 10 Heritage Policies

- 10.1 The final policy section is concerned with conserving or preserving the historic built environment and heritage. Historic England argued that paras 3.27 and 8 would sit more logically in sub-section 7.46.
- 10.2 Both Heritage Policies 2 and 3 are, however, not concerned with the use or development of land, as also argued by Historic England and MK Council; and so I **recommend** be removed to a separate appendix, and are clearly identified as Community Actions, or similar, and not described as policies. Policy 1 can remain.

## 11. Referendum Area

- 11.1 Planning Practice Guidance on the Independent Examination (Paragraph: 059 Reference ID: 41-059-20140306) says:

*“It may be appropriate to extend the referendum area beyond the neighbourhood area, for example where the scale or nature of the proposals in the draft neighbourhood plan or Order are such that they will have a substantial, direct and demonstrable impact beyond the neighbourhood area.”*

- 11.2 There are no formal development site allocations in this plan and in my view the nature and scale of what it proposes would not *have a substantial, direct and demonstrable impact beyond the neighbourhood area*. I therefore **recommend** that the Referendum Area be the same as the designated neighbourhood area.

## 12 Conclusions and recommendations

- 12.1 I can see that the Parish Council volunteers have put in a great deal of hard work into the submission of the plan and the supporting documents. The plan is well presented and clear; though the mapping needs to be improved to achieve the necessary clarity to meet the Basic Conditions as a development plan document. It seeks to represent the local community’s aspirations, which it does well. Where it has not succeeded so well is in the way some of the policies have been evidenced. And, some policies need to be removed from the body of the plan as they advocate Community Action.

- 12.2 Overall, from my examination of the submitted Neighbourhood Development Plan, together with the supporting documents, including having regard to all the representations made, I have concluded that the making of the plan will meet the Basic Conditions; also that the legal requirements are met subject to my recommended modifications. I have set out my conclusions, drawn from the findings in my report, in the Summary, on page 3.
- 12.3 In summary, I **recommend** that the Campbell Park Neighbourhood Development Plan should proceed to referendum. I **recommend** that if the plan does proceed to referendum then the Referendum Area should be the same as the designated neighbourhood area
- 12.4 Finally, my thanks to both Councils for their support in making the examination so smooth.

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